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50 *Counsel for Defendant; additional counsel
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52 **UNITED STATES DISTRICT COURT
53 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

54 CHASOM BROWN, MONIQUE
55 TRUJILLO, WILLIAM BYATT, JEREMY
56 DAVIS, and CHRISTOPHER CASTILLO,
57 individually and on behalf of all similarly
58 situated,

59 Plaintiffs,

60 v.

61 GOOGLE LLC,
62 Defendant.

63 Case No. 4:20-cv-03664-YGR-SVK

64 **JOINT STIPULATION AND [PROPOSED]
65 ORDER FURTHER EXTENDING TIME
66 FOR GOOGLE TO SUBMIT
67 DECLARATION IN SUPPORT OF
68 PLAINTIFFS' MOTION TO SEAL (DKT.
69 429)**

70 Referral: The Honorable Susan van Keulen

1 Pursuant to Civil Local Rule 6-2 and 7-12, this joint stipulation is entered into between
 2 Plaintiffs and Google LLC (“Google”), collectively referred to as the “Parties.”

3 WHEREAS, on February 26, 2022, Plaintiffs filed their Administrative Motion To Consider
 4 Whether Portions Of Plaintiffs’ Request For Order To Show Cause Re: Sanctions For Google’s
 5 Discovery Misconduct (“Motion to Seal”) (Dkt. 429);

6 WHEREAS, on February 26, 2022, Google received unredacted copies of Plaintiffs’ Motion
 7 to Seal and exhibits, approximately 25 of which were designated to be sealed and submitted with
 8 Dkts. 429, 430;

9 WHEREAS, pursuant to Civil Local Rule 79-5(e), the deadline for Google, as the
 10 Designating Party to Plaintiffs’ Motion to Seal (Dkt. 429), to establish that such designated material
 11 is sealable, was Saturday, March 5, 2022;

12 WHEREAS, the Parties agreed on, and the Court approved, an extension of time to March
 13 16, 2022 for Google to respond to Plaintiffs’ Motion to Seal (Dkt. 448);

14 WHEREAS, the Parties agree that an additional extension of seven days will provide Google
 15 with sufficient time to respond to Plaintiffs’ Motion to Seal (Dkt. 448)

16 NOW THEREFORE, the Parties stipulate to extend the deadline by which Google shall
 17 submit a Declaration in support of Plaintiffs’ Motion to Seal (Dkt. 429), to March 23, 2022.

18 DATED: March 15, 2022
 19

20 QUINN EMANUEL URQUHART &
 21 SULLIVAN, LLP

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24 *Attorneys for Plaintiffs*

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1
2 **ATTESTATION OF CONCURRENCE**
3

4 I am the ECF user whose ID and password are being used to file this JOINT STIPULATION
5 AND [PROPOSED] ORDER EXTENDING TIME FOR JOINT STIPULATION AND
6 [PROPOSED] ORDER EXTENDING TIME FOR GOOGLE TO SUBMIT DECLARATION IN
7 SUPPORT OF PLAINTIFFS' MOTION TO SEAL (DKT. 429). Pursuant to Civil L.R. 5-1(i)(3), I
8 hereby attest that each of the signatories identified above has concurred in the filing of this document

9 Dated: March 15, 2022

10 By /s/ Andrew H. Schapiro

11 Andrew H. Schapiro

12 *Counsel on behalf of Google*

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[PROPOSED] ORDER

Pursuant to stipulation of the Parties, the Court hereby **ORDERS**:

The deadline for Google to submit a Declaration in support of Plaintiffs' Motion to Seal (Dkt. 429), shall be extended to March 23, 2022.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

HONORABLE SUSAN VAN KEULEN
United States Magistrate Judge